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(additional counsel information on next page)

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

AMERICAN CIVIL LIBERTIES
UNION FOUNDATION OF
SOUTHERN CALIFORNIA,
Plaintiff,

v.

UNITED STATES IMMIGRATION
AND CUSTOMS ENFORCEMENT,
et al.,
Defendants.

Case No. 2:22-CV-04760-SHK

**DECLARATION OF KYLE
VIRGIEN IN SUPPORT OF
PLAINTIFF'S MOTION TO
ENFORCE JULY 8, 2024 ORDER
ON MOTION FOR SUMMARY
JUDGMENT (ECF NO. 87)**

Honorable Shashi H. Kewalramani
United States Magistrate Judge

Hearing Date: June 18, 2025
Time: 10:00 a.m.

1 EUNICE CHO (*pro hac vice*)
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15 *Attorneys for Plaintiff*

1 I, Kyle Virgien, declare as follows:

2 1. I am counsel for Plaintiff ACLU Foundation of Southern California in
3 the above-captioned matter. I submit this declaration in support of Plaintiff's
4 Motion to Enforce July 8, 2024 Order on Motion for Summary Judgment (ECF No.
5 87). I have personal knowledge of the facts set forth below, and if called as a
6 witness, I could and would competently testify thereto.

7 2. On December 11, 2024, Joseph Tursi, defense counsel in this case,
8 sent a letter to my co-counsel Laboni A. Hoq, CCing the Court (by chambers
9 email), my co-counsel Eunice Cho and Eva Bitran, and me. Attached hereto as
10 Exhibit A is a true and correct copy of that letter.

11 3. Attached hereto as Exhibit B is a true and correct copy of a document
12 produced by CRCL on February 21, 2025, in response to Plaintiff's FOIA request.
13 This document, marked with Bates numbers 24-CRLI-00005-000073-81, is an
14 email dated August 16, 2021, and titled "CRCL Investigation at the Adelanto ICE
15 Processing Center."

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17 I declare under penalty of perjury under the laws of the United States of America
18 that the foregoing is true and correct.

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20 Executed on May 30, 2025, at Kensington, California

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